## Case 1:17-cv-08796-NRB Document 93 Filed 04/22/20 Page 1 of 1



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Application granted. Dated: April 22, 2020

April 22, 2020

NAOMI REICE BUCHWALD UNITED STATES DISTRICT JUDGE

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The Honorable Naomi Reice Buchwald United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007-1312

> Fujifilm North America Corporation v. PLR IP Holdings, LLC et al., Re:

Case No. 1:17-cv-08796-NRB (S.D.N.Y.)

Dear Judge Buchwald:

We write jointly on behalf of all parties, including Fujifilm North America Corporation and Fujifilm Corporation (collectively, "Fujifilm") and PLR IP Holdings, LLC and PLR Brand Services, LLC, and Counterclaim Plaintiffs Impossible B.V. and Impossible America Corp. d/b/a Polaroid Originals (collectively, "Polaroid").

On March 12, 2020, this Court entered an Order staying all discovery for a period of 45days, through April 27, 2020, directing "the parties to fully cooperate with each other to maximize progress in this case consistent with objective issues related to COVID-19." (ECF 91.) The parties have been in frequent communication and have worked cooperatively throughout the stay.

Due to ongoing complications from the global pandemic, both locally and in other jurisdictions where the parties' witnesses reside, the parties jointly request that the Court extend the stay through May 29, 2020. The parties will continue to cooperate during the continued stay, and will ensure that depositions resume once the stay ends, even if they must be conducted remotely via videoconference. We are available at the Court's convenience to discuss any concerns.

## Respectfully submitted,

/s/ James J. DeCarlo

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